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December 29, 2010

Ms. Theresa Stiner  
Planning, Permitting, and Engineering Section  
Iowa Department of Natural Resources  
Wallace Building, 502 East 9<sup>th</sup> Street  
Des Moines, Iowa 50219-0034

Subject: End of Life Vehicle Solutions Corporation Annual Manufacturers' Implementation Report

Dear Ms. Stiner,

Iowa Administrative Code 567-Chapter 215, "Mercury-Added Switch Recovery from End-of-Life Vehicles", requires vehicle manufacturers to annually report:

- (1) the number of mercury-added switches collected
- (2) an estimate of the amount of mercury contained in the collected switches
- (3) the capture rate
- (4) the estimated number of vehicles manufactured containing mercury added switches; and
- (5) the estimated number of vehicles that have been processed for recycling

This report is provided by End of Life Vehicle Solutions Corporation on behalf of its member automotive companies. The participating members of ELVS are: Chrysler Group LLC; Daimler EAPP Americas; Ford Motor Company; Motors Liquidation Company (formerly General Motors Corporation); Mack Trucks Inc; Mitsubishi Motors North America, Inc; Navistar, Inc.; Nissan North America, Inc; PACCAR, Inc; Porsche Cars North America Inc.; Subaru of America, Inc; Toyota Motor Sales USA, Inc.; Volkswagen Group of America, Inc; Volvo Cars of North America; and Volvo Trucks North America.

#### Mercury Switch Collections

For the period December 16, 2009 through December 15, 2010 a total of 14,733 mercury switches were delivered to the ELVS recycling contractor from Iowa dismantlers, yielding 32.4 pounds of recovered mercury. There are 387 registered dismantlers in Iowa, 75 of which have submitted switches during this period.

The estimated number of switches available for recovery in Iowa during 2010 was 64,000, resulting in an annual capture rate through December 15, 2010 of 23.0%.

ELVS uses the National Vehicle Mercury Switch Recovery Program (NVMSRP) Switch Retirement Model ([www.elvsolutions.org/model.html](http://www.elvsolutions.org/model.html)) approved by the U.S. EPA and program partners to estimate mercury switch populations. The model was developed to identify switch populations and estimate mercury switch retirement rates through 2017. Therefore the model focuses on mercury switch counts rather than vehicle counts. The model reports that the estimated national total number of mercury switches historically manufactured in vehicles to be 169,185,000. Most of the vehicles containing these switches have already been scrapped, with an estimated 18,339,000 switches remaining in today's national fleet for collection through 2017. Iowa's portion of these switches remaining for collection through 2017 is estimated at 311,000. The number of mercury switches that

were available nationally for recovery in 2010 is estimated to be 3,669,000 units. In Iowa, 64,000 switches were available for recovery in 2010.

The information presented here is available through the ELVS website, [www.elvsolutions.org](http://www.elvsolutions.org) with linkage to our contractor's website, <http://www.eqonline.com/services/ELVS-Mercury-Switch-Recovery-Program/annual-report.asp?year=all>. Information is updated daily as additional switches are delivered to our contractor, and is available for downloading into Excel for your convenience. This web-based data tracking system is part of ELVS' commitment to data accessibility, and will be available until 2017.

#### Future Actions

NVMSRP constantly assesses the overall progress of mercury switch recovery programs in order to identify what additional actions may be needed to encourage further recycler participation and to improve switch capture rates. In an effort to boost mercury switch collections in 2010, ELVS eliminated the requirement that recyclers record Vehicle Identification Numbers for vehicles that were found to contain the switches. This was intended to reduce the recyclers' work load to enhance the likelihood that switches would be pulled.

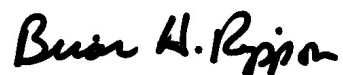
In 2011, ELVS plans to implement a direct mailing to all Iowa auto recyclers in our database that have never turned in a bucket. The letter will encourage them to become active in the program, informing them that removing mercury switches is required in Iowa and participation is also required as part of the federal "Cash for Clunkers" program (federal inspectors remain active in unannounced inspections of yards that processed vehicles under that program).

We believe that outreach communications will help refresh recyclers' knowledge of the ELVS program and requirements in Iowa. We invite you to provide us with any additional information that should be contained in the letter pertaining to requirements in Iowa. We also encourage IDNR to consider some basic form of enforcement action (yard visits, etc.) that would stimulate inactive participants to incorporate switch collections into their normal vehicle recycling processes.

Our goal is to complete this mailing in the first quarter of 2011 and we look forward to an increase in the number of switches returned to ELVS for recycling.

If you have any questions or comments regarding this report, please contact me at [breivs@yahoo.com](mailto:breivs@yahoo.com) or 248-477-7357.

Sincerely,



Brian Rippon  
End of Life Vehicle Solutions  
Project Manager